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7 ALTERA DIGITAL HEALTH INC.

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 PALO VERDE HEALTHCARE
DISTRICT, a public entity,

12 Plaintiff,

13 vs.

14 ALTERA DIGITAL HEALTH INC., a
15 Delaware corporation, and DOES 1
through 10, inclusive,

16 Defendant.
17

Case No. 5:24-cv-00666-FLA DTBx

Honorable Fernando L. Aenlle-Rocha

**NOTICE OF ERRATA RE
DECLARATIONS IN SUPPORT OF
ALTERA DIGITAL HEALTH
INC.'S OPPOSITION TO PALO
VERDE'S APPLICATION FOR
PRELIMINARY INJUNCTION**

Hearing

18 Date: April 26, 2024
19 Time: 9:00 a.m.
20 Dept.: 6B

1 **TO THE HONORABLE COURT; TO THE CLERK OF COURT; TO**
2 **ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

3 When Defendant Altera Digital Health Inc. (Altera) was filing its Opposition
4 to Palo Verde Healthcare District’s Application for Preliminary Injunction (Docket
5 No. 18) on April 15, 2024, our night staff began receiving multiple errors from the
6 CM/ECF filing system: “ERROR: Document is malformed or contains code which
7 may cause an external action (such as launching an application). This PDF document
8 cannot be accepted.” It took technical time to get to the root of these errors.

9 Each exhibit was searched for script codes, but none appeared to contain any.
10 After further investigation on an offline system, it was discovered that three
11 DocuSigned PDF declarations our filing team were trying to submit exactly as
12 received from our client, inexplicably contained Adobe e-Signature prompt scripts
13 within them. Our filing team then began the process of “flattening” each individual
14 PDF declaration, three in total, to try to correct the technical errors preventing the
15 declarations from being processed by the CM/ECF system after upload. This solved
16 the problem and caused the 35-minute delay in filing the declarations.

17 We have discovered that in the process of flattening and submitting the
18 declarations, there was an inadvertent exclusion of the accompanying exhibits that
19 had been previously attached to the original DocuSigned declarations containing the
20 Adobe e-Signature code. As a result, the declarations below were filed without
21 exhibits:

22 1. Elliott Bryant’s Declaration (Docket No. 19) inadvertently excluded
23 Exhibits 1–8. A corrected version of the Declaration of Elliott Bryant that Altera
24 intended to file, with Exhibits 1–8 attached thereto, is attached as **Exhibit A**.

25 2. Thomas McCabe’s Declaration (Docket No. 19-1) inadvertently
26 excluded Exhibits 1–2. A corrected version of the Declaration of Thomas McCabe
27 that Altera intended to file, with Exhibits 1–2 attached thereto, is attached as **Exhibit**
28 **B**.

